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DEPARTMENT OF TRANSPORTATION

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February 19, 1991

Docket Clerk  
U.S. Department of Transportation  
Room 4107  
400 7th Street, S.W.  
Washington, D.C. 20590

RE: Docket No. 47383; Notice 91-2

COMMENTS OF THE REGIONAL AIRLINE ASSOCIATION TO THE ANPRM REGARDING  
AVIATION SECURITY: PASSENGER MANIFEST INFORMATION

The Regional Airline Association (RAA), on behalf of its 78 member airlines, appreciates the opportunity to comment on this Advance Notice of Proposed Rulemaking. Regional airlines provide scheduled short-haul service to more than 800 airports in North America, the Bahamas, and the Caribbean, using aircraft ranging in size from 8 seats to 100 seats. The bulk of regional airline service is provided by turboprop aircraft in the 19-72 seat range.

Regional airline service to cities outside the United States is currently provided by 20 airlines. Cities served totaled 43 in January 1991, with the majority of points served being in the Bahamas and the Caribbean. The number of passengers carried internationally by these carriers was estimated by RAA to total 1.5 million people in 1990, or 3.8 percent of total passengers carried by the regional airline industry. Regional airlines, therefore, carried less than 4 percent of total international passengers transported by U.S. scheduled carriers.

RAA is very concerned about the promulgation of any new regulations that will impose additional costs on regional airlines in this recessionary period. Regional carriers are already facing significantly increased security costs due to the required implementation of FAA Level 4 security regulations. Many carriers have already been notified of increased fees for security

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screening, law enforcement patrols or other enhanced measures. In some cases these fees have amounted to more than \$20,000 per airport served.

At this time, the association cannot quantify the increased costs that could be imposed by the promulgation of this regulation. Carriers have expressed concerns about training costs for all reservation and ticket agents handling international flights. There are also concerns about potentially increased fees from computer reservation system (CRS) vendors for modifications to existing CRS functions or additional necessary time to book international reservations. It is also possible that airlines may be forced to purchase additional computer terminals or negotiate for increased counter space, in order to comply with this proposed regulation. Any such costs will likely be exacerbated by the requirement of implementing the regulation within 120 days.

RAA does not believe that DOT should require airlines to collect and maintain the required data in the computer reservation system. Regional airlines favor a system allowing carriers to develop data collection schemes that are best suited to their own unique operations. This may include the usage of the computer reservation system or simply a manual system of recordkeeping. However, we do not see any justification for a requirement that each airline obtain DOT approval for its system.

RAA questions the practicality of any system that would require airlines to ensure that the information is collected by all travel agents. This highly decentralized industry issues an estimated 75 percent of regional airline tickets for international travel. As stated in the ANPRM, airlines can control reservations made by their own employees, but cannot exercise similar control over the reservations made by the more than 36,000 travel agency locations existing in the United States.

The association favors the requirement that airlines collect this data only from U.S. citizens. While we are not aware of any foreign laws that would forbid the collection of such information or impose limits on its access (owing to privacy restrictions), any requirement mandating data collection from foreign citizens would effectively force regional airlines to become experts in the privacy laws of all of the countries to which they provide service.

RAA does not believe that the traveling public would select an airline on the basis of the need to provide the additional information outlined in the ANPRM. However, it is possible that passengers could receive negative impressions about the customer service provided by a U.S. airline vis-a-vis a foreign carrier if

collection of the required data resulted in long lines at the ticket counter or gate. Therefore, foreign carriers should also be subject to any requirements for data collection from U.S. citizens to alleviate any possible competitive impact that could arise from either passenger perceptions or from cost factors related to the rule.

Thank you for your consideration of these comments.

Respectfully submitted,



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Vice President